

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,

### Individual and Representative Plaintiffs,

V.

META PLATFORMS, INC., a Delaware corporation;

Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI VO IN SUPPORT  
OF ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBIT TO JOINT  
DISCOVERY LETTER BRIEF**

1 I, Nikki Vo, hereby declare:

2 1. I am Director and Associate General Counsel for Defendant, Meta Platforms, Inc. I  
 3 have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,  
 4 could and would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal  
 6 portions of Exhibit A to the Parties' Joint Discovery Letter regarding Meta's Responses to  
 7 Plaintiffs' First and Second Sets of Requests for Admission ("Joint Letter Brief"). The motion  
 8 seeks to have the following partially sealed:

9 Document	Sealing Request
10 Exhibit A to Joint Letter Brief	<ul style="list-style-type: none"> <li>• Redacted portions</li> </ul>

11 3. The redacted portions of Exhibit A to the Joint Letter Brief are responses to  
 12 Plaintiffs' Requests for Admission that Meta had designated "CONFIDENTIAL" under the  
 13 Protective Order in this case. The redacted responses refer to highly sensitive, non-public  
 14 information concerning Meta's business practices surrounding its Llama models and the datasets  
 15 used to train the Llama models.

16 4. Public disclosure of the information contained in the above-referenced materials  
 17 exposes Meta to the risk of financial and competitive harm by revealing Meta's non-public business  
 18 strategies, technical information, and trade secret information pertaining to its generative AI  
 19 offerings. Meta takes steps to carefully protect the confidentiality of information of this sort.

20 I declare under penalty of perjury under the laws of the United States of America that the  
 21 foregoing is true and correct

22 Executed in Palo Alto, California on this 26<sup>th</sup> day of November, 2024.

23 .

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 25 Nikki Vo

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